

Remarks / Arguments

Claims 1-20 are pending in the present application. Independent claims 15 and 18 have been amended above to better clarify the claimed invention. Dependent claims 9-13 have been amended to correct an inadvertent error. No new matter is introduced herein.

Claims 1-13, 19 and 20 stand rejected under 35 USC 102(e), as being anticipated by U.S. Patent No. 6,650,638 to Walker et al. (hereinafter "Walker"). While Applicants reserve the right to pre-date this reference, Applicants respectfully assert that even if Walker is in fact prior art, it would not anticipate claims 1-13, 19 and 20 for the reasons set forth below.

In support of this rejection, the Examiner asserts, with respect to independent claims 1 and 19, that:

Walker discloses a data stream compression apparatus 30 (fig. 1) comprising ... a control unit 193 for providing said control signal identifying a predetermined portion of non-unique, invariant content of said first stream of data entities, said predetermined portion of non-unique, invariant content being identified using pre-knowledge of the type of said first data stream of data entities (fig. 10A, col. 21 lines 12-21)... (Office Action, pp. 2-4).

Applicants respectfully disagree with the Examiner's characterization of Walker. The portion of Walker on which the Examiner relies for the above proposition does not teach that which the Examiner contends. More specifically, Walker does not teach a compression apparatus in which a "predetermined portion of non-unique, invariant content [is] identified using pre-knowledge of the type of said first data stream of data entities." Rather, as described in Walker:

[t]he type word extractor 193 receives the payload field PF from the descrambler 192 and additionally receives the master transition MT from the frame decoder 191. The type word extractor operates only when the master transition is in its second state, corresponding to a frame whose payload field is not composed exclusively of information words. The type word extractor extracts the TYPE word from the sub-field 157 of the payload field 152 (FIG. 4C) and feeds the TYPE word to the block generator 194 and the block sequence detector 195. (Walker at col. 21, lines 12-21, emphasis added).

As described in Walker, a type word extractor 193 determines the type of data content from the data itself, namely, the TYPE word from the sub-field 157 of the payload field 152. Thus, quite differently from the claimed invention, the apparatus described in Walker does not use pre-knowledge of the type of said first data stream of data entities to identify the predetermined portion of non-unique, invariant content.

As such, for the foregoing reasons, independent apparatus claim 1, independent method claim 19, and claims 2-7 which depend from claim 1, are not anticipated by Walker.

The above arguments also apply to the expansion apparatus and method of independent claims 8 and 20, respectively, which recite using pre-knowledge to identify a predetermined portion of non-unique invariant content which is to be added to another data stream. The Examiner points to FIG. 4C and col. 9, lines 47-48 of Walker in arguing that Walker teaches such features. This excerpt merely shows the use of the TYPE sub-field 157 of the data itself as the means for identifying the type of data content, as discussed above in the case of compression.

As such, for the foregoing reasons, independent apparatus claim 8, independent method claim 20, and claims 9-13 which depend from claim 8, are not anticipated by Walker.

Claims 14-18 stand rejected under 35 USC 103(a) as being unpatentable over Walker. Again, while Applicants reserve the right to pre-date Walker, Applicants respectfully disagree with this rejection as well.

Each of independent claims 14, 15, 17 and 18 recites the use of pre-knowledge to identify a predetermined portion of non-unique invariant content, whether it be in compression or expansion apparatus. As established above, Walker does not teach such an identification scheme, but rather relies on the contents of a data sub-field to identify the type of data content.

Additionally, as the Examiner concedes, Walker does not teach a data compression multiplexer apparatus comprising a plurality of data stream compression apparatuses, as recited in independent claims 14 and 15, or a data expansion demultiplexer apparatus comprising a plurality of data stream expander apparatus, as recited in independent claims 17 and 18.

As such, for the foregoing reasons, independent apparatus claims 14, 15, 17 and 18, and claim 16 which depends from claim 14, are not rendered unpatentable by Walker.

In view of the foregoing, Applicants respectfully submit that all pending claims, 1-20, are allowable in their present form. Accordingly, both reconsideration of this application and its swift passage to issuance are earnestly solicited.

If however, there remain any unresolved issues requiring adverse action in any of the claims now pending in this application, the Examiner is urged to contact the undersigned so that any such issues can be resolved as expeditiously as possible.

Respectfully submitted,

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By: /Chris Kolefas/
Chris Kolefas (Reg. No. 35,226)

Brosemer, Kolefas & Associates, LLC
1 Bethany Road, Suite 58
Hazlet, New Jersey 07730
Tel.:(732)335-5788